

We are concerned with the timeline for compliance for the CSR as in order to receive a CSR one must first attain an ISS certificate. In order to attain an ISS USCG must first approve VSPs then conduct an audit to ensure implementation then issue ISS. Only then can we apply for CSR. Currently our VSP is still being reviewed by USCG. July 1 is 4 months from Monday.

Further complicating our meeting the deadline is that ASM is a despondent owner of vessels. The Owner is Wilmington Trust who will be dealing with the National Vessel Document Center. Every year the process of attaining the Certificate of Documentation becomes more tenuous due to complexity of this arrangement.

As there are only 603 SOLAS Vessels subject to this whereas there are 10000 VSPs being reviewed under MTSA regulations my suggestion is that the CSR Desk communicate with the USCG office conducting the VSP Reviews and fast track these 603 vessels so that we have some possibility of meeting the 1 July deadline.

My regards to J. Angelo